

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

Kevin Turner and Shawn Wooden,
*on behalf of themselves and
others similarly situated,*

Plaintiffs,

v.

National Football League and
NFL Properties LLC,
successor-in-interest to
NFL Properties, Inc.,

Defendants.

THIS DOCUMENT RELATES TO:
ALL ACTIONS

No. 2:12-md-02323-AB

MDL No. 2323

Hon. Anita B. Brody

Civ. Action No. 14-00029-AB

**DECLARATION OF STEVEN C. MARKS
IN RESPONSE TO CO-LEAD COUNSEL'S PROPOSED ALLOCATION OF COMMON
BENEFIT ATTORNEYS' FEES AND EXPENSES**

I, STEVEN C. MARKS, declare as follows pursuant to 28 U.S.C. § 1746:

1. I am a Partner of the law firm of Podhurst Orseck, P.A. and was appointed as Settlement Class Counsel in this litigation. I also served on the Plaintiffs' Executive Committee, on the Plaintiffs' Steering Committee, and as Co-Chair of Communications Committee.

2. I adopt my previously filed Declaration (DE 7151-8), which details Podhurst Orseck's substantial work and contributions at every stage of this action.

3. As almost the entirety of the Plaintiffs' Steering Committee and Plaintiffs' Executive Committee have done, Podhurst Orseck objects not only to the specific fee we were allocated under Co-Lead Counsel's proposal, but also to the process that Co-Lead Counsel followed.

4. The flaws in Co-Lead Counsel's process and proposal are thoroughly addressed in several objections already submitted. Podhurst Orseck does not wish to burden the Court with further submissions, but we also did not want our silence to be construed as an endorsement of Co-Lead Counsel's proposed allocation, and thus felt compelled to register our objection as well.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 27, 2017, at Miami, Florida.

/s/ Steven C. Marks
Steven C. Marks, Esq.
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CERTIFICATE OF SERVICE

I hereby certify that on October 27, 2017, I caused the foregoing document to be filed with the United States District Court for the Eastern District of Pennsylvania via the Court's CM/ECF system, which will provide electronic notice to all counsel and parties.

/s/ Steven C. Marks
Steven C. Marks, Esq.